

AO 91 (Rev 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Tristan Javon Swanson

Case No. 2:21-mj-721

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2/26/2020 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section
18 USC 922(g)(1)

Offense Description
Possession of a firearm by a convicted felon

This criminal complaint is based on these facts:

SEE ATTACHED

☒ Continued on the attached sheet.



Complainant's signature

James Bajus Special Agent ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: November 3, 2021

City and state: Columbus, OH


Kimberly A. Johnson
United States Magistrate Judge



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the Matter of the Criminal Complaint:

United States of America

v.

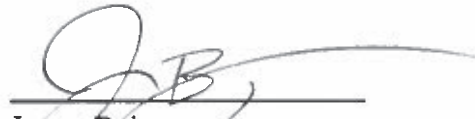
Tristan Javon Swanson

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, James Bajus, being duly sworn, depose and state that:

1. I have been a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since June 2007. Your affiant is a graduate of the ATF National Academy Special Agent Basic Training and Federal Law Enforcement Training Center Criminal Investigator Training Program. As a result of my training and experience as an ATF Special Agent, I am familiar with Federal criminal laws.
2. In October 2008, Tristan Swanson pled guilty to one count of Trafficking in Drugs (F2), a crime punishable by more than one year in prison, (criminal Case Number 08CR 2552) in the Franklin County, Ohio Court of Common Pleas.
3. In March 2020, ATF Agents learned of a suspicious purchase of firearms that took place at Vance Outdoors, 3723 Cleveland Avenue, Columbus, OH. This purchase was conducted by D.D., a person associated with Tristan Swanson. Tristan Swanson was present for, and participated in, the transaction as described below.
4. A review of sales records from Vance Outdoors determined that D.D. purchased two firearms, ammunition, and pepper spray from Vance Outdoors on February 26, 2020. These firearms are described as a Smith and Wesson M&P 40, .40 caliber pistol serial number CPD3061 and a SCCY CPX-2, 9mm pistol serial number 705410. A review of surveillance video shows Swanson handling both firearms during the transaction, shaking hands with the clerk and carrying the firearms out of the store.
5. Additional investigation revealed that both D.D. and Swanson traveled to AimHi Family Firearms Center, 10299 Johnstown Road, New Albany, OH, on February 29, 2020 and signed waivers and used the shooting range. However, the video surveillance no longer exists.
6. Based on the description provided of the firearms sold to D.D. on February 26, 2020, it was determined that neither firearm was manufactured in the State of Ohio and therefore travelled in interstate commerce to reach the State of Ohio.

7. The aforementioned offenses occurred in Franklin County, Ohio, in the Southern Judicial District of Ohio.
8. Based on this information, your affiant believes probable cause exists that Tristan Swanson possessed the firearms purchased by D.D. after having been convicted of a crime punishable by imprisonment for a term exceeding one-year, in violation of 18 U.S.C. 922(g)(1).


James Bajus
Special Agent ATF

November 3, 2021

Sworn to and subscribed before me on this ____ day of November 2021.


Kimberly A. Johnson
United States Magistrate Judge

